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January 23, 2020

Via ECF

Hon. P. Kevin Castel
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

**Re: *Hai v. First Data Corporation, et. al.* (Case No. 1:19-cv-8332-PKC)
Joint Request to Extend Discovery and Adjourn Conference**

Dear Judge Castel:

This Firm represents the Defendants in the above-referenced matter, and we are authorized by Plaintiff to submit this Joint Request to extend the period for discovery, and to adjourn the next scheduled conference. The next conference is scheduled for March 18, 2020 at 12:00 pm.

At the initial pre-trial conference, the Court inquired whether the parties would agree to participate in an early settlement conference in this matter. The parties agreed, and in an effort to conserve resources should an early settlement be feasible, abstained from serving substantive discovery requests until after the settlement conference/mediation. However, no resolution was reached, and the beginning of the discovery period was effectively delayed until late-December. **Notwithstanding the parties' failure to reach an agreement at mediation, the parties are engaging in a good faith effort to settle this matter, before having to expend significant fees and client-time preparing for and engaging in discovery.**

Accordingly, the parties respectfully request a ninety (90) day extension of the discovery deadlines in this case to account for lost time pre-mediation, and to provide additional time for settlement discussions before the need to take depositions. Considering this request, the parties further request that the conference scheduled for March 18, 2020 be rescheduled for a day after the close of fact discovery.

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This is the parties' first request to extend discovery, or to adjourn the March 18 conference. A [Proposed] Revised Civil Case Management Plan and Scheduling Order, in a form substantially similar to the prior Civil Case Management Plan and Scheduling Order entered by the Court, accompanies this Joint Request.

Thank you for your consideration.

Respectfully submitted,

/s/ Erik P. Pramschufer

Erik P. Pramschufer, Esq.

cc: All counsel (via ECF)